

1 Scott J. Sagaria (SBN 217981)
2 SJSagaria@sagarialaw.com
3 Elliot W. Gale (SBN 263326)
4 EGale@sagarialaw.com
5 Joe Angelo (SBN 268542)
6 JAngelo@sagarialaw.com
7 SAGARIA LAW, P.C.
8 3017 Douglas Blvd., Ste 100
9 Roseville, CA 95661
10 Telephone: (408) 279-2288
11 Facsimile: (408) 297-2299

12 Attorneys for Plaintiff Heather Kaimana

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**

15 HEATHER KAIMANA,
16
17 Plaintiff,

18 v.

19 BANK OF AMERICA, N.A.,
20
21 Defendant.

Case No.: 5:17-cv-01828-HRL

**STIPULATION FOR DISMISSAL OF
DEFENDANT BANK OF AMERICA,
N.A.; [PROPOSED] ORDER**

22 **TO THE COURT, CLERK OF COURT, AND ALL PARTIES:**

23 IT IS HEREBY STIPULATED by and between plaintiff Heather Kaimana and
24 defendant Bank of America, N.A. that Bank of America, N.A. be dismissed from this action
25 with prejudice pursuant to Federal Rules of Civil Procedure, Rule 41(a)(2), and that each party
26 shall bear its own attorneys' fees and costs.

27 //

28 //

//

//

//

1 DATED: September 19, 2017

Sagaria Law, P.C.

2 By: /s/ Elliot Gale
3 Elliot Gale
4 Attorney for Plaintiff Heather Kaimana

5 DATED: September 19, 2017

McGuire Woods, LLP

6 By: /s/ Raymond William Berry
7 Raymond William Berry
8 Attorney for Defendant Bank of America,
9 N.A.

10 I, Elliot Gale, am the ECF user whose identification and password are being used to file this
11 Stipulation. I hereby attest that Raymond William Berry has concurred in this filing.
12

13 /s/ Elliot Gale
14

15
16 **[PROPOSED] ORDER**

17 Pursuant to the stipulation of the Parties, Bank of America, N.A. is dismissed with
18 prejudice.

19 IT IS SO ORDERED.
20
21
22

23 DATED: _____

24 _____
25 Hon. Howard R. Lloyd
26 UNITED STATES DISTRICT JUDGE
27
28